

**COX, WOOTTON, GRIFFIN,
HANSEN & POULOS LLP**
Gregory W. Poulos (SBN 131428)
Max L. Kelley (SBN 205943)
190 The Embarcadero
San Francisco, CA 94105
Telephone No.: 415-438-4600
Facsimile No.: 415-438-4601

LAW OFFICES OF RICHARD P. WAGNER

Richard P. Wagner (SBN 166792)
700 Oceangate, Suite 700
Long Beach, CA 90802
Telephone: (562) 216-2946
Facsimile: (562) 216-2960

Attorneys for Plaintiff
DEL MAR SEAFOODS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEL MAR SEAFOODS, INC.) Case No.: CV 07-02952 WHA
Plaintiff,)
vs.)
BARRY COHEN, CHRIS COHEN (aka)
CHRISTENE COHEN), *in personam* and)
F/V POINT LOMA, Official Number)
515298, a 1968 steel-hulled, 126-gross ton,)
70.8- foot long fishing vessel, her engines,)
tackle, furniture, apparel, etc., *in rem*, and)
Does 1-10,)
Defendants.)
And Related Counterclaims)
PLAINTIFF'S STATEMENT OF)
NON-OPPOSITION TO)
DEFENDANTS' MOTION TO)
SHORTEN TIME TO HEAR)
MOTION FOR PROTECTIVE)
ORDER

Pursuant to L.R. 7-3(b), Plaintiff DEL MAR SEAFOODS, INC. hereby submits this Statement of Non-opposition to Defendants' Motion to Shorten Time to Hear Its Motion For Protective Order regarding the deposition of defendant/counterclaimant Chris Cohen.

COX, WOOTTON,
GRIFFIN, HANSEN
& Poulos LLP

190 THE EMBARCADERO
SAN FRANCISCO, CA
94105
TEL 415-438-4600
FAX 415-438-4601

STATEMENT

Plaintiff DEL MAR SEAFOODS, INC. intended to file an Opposition Brief, pursuant to L.R. 7-3(a), asserting that Defendant's Motion to Shorten Time should be denied on the grounds that defense counsel had improperly failed to meet and confer in good faith per L.R. 37-1(a). Since the Court has already ruled on Defendants' Motion to Shorten Time, however, Plaintiff will not oppose that Motion, but will instead include its contention that defendants' failed to meet and confer in good faith in its Opposition to Defendants' Motion for a Protective Order regarding Chris Cohen's deposition.

Plaintiff acknowledges that the deadline for filing its Opposition Brief is December 26, 2007, and that the hearing on Defendants' Motion for Protective Order will be on January 3, 2008 at 8:00 a.m.

Respectfully submitted,

Dated: December 20, 2007

COX, WOOTTON, GRIFFIN,
HANSEN & POULOS, LLP
Attorneys for Plaintiff
DEL MAR SEAFOODS, INC.

By:

Max L. Kelley
Gregory W. Poulos

COX, WOOTTON,
GRIFFIN, HANSEN
& POULOS LLP

190 THE EMBARCADERO
SAN FRANCISCO, CA
94105
TEL 415-384-6000
FAX 415-384-6001

DelMar Seafoods/250.4